

REMARKS

Applicants reply to the Office Action mailed on February 27, 2007 within the shortened statutory three-month period for reply. Claims 1-3, 5, 7-15, 17-22, 24-26, 28, 30, 32, and 33 were pending in the application and the Examiner rejects claims 1-3, 5, 7-15, 17-22, 24-26, 28, 30, 32, and 33. Support for the amendments may be found in the originally filed specification, claims, and figures. No new matter has been introduced by these amendments. Reconsideration of this application is respectfully requested.

Rejection under 35 U.S.C. § 112

The Examiner rejects claims 1, 8, 13, 20, and 33 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Examiner asserts that the specification does not provide support for the claim element of, “compiling offer data regarding the most frequently requested destination based on information stored in the answer database *relating to a subset of customers*, wherein the offer data is used to select an offer relevant to offer data *for presentation to the customer*” (page 3, item 5). Applicants respectfully disagree.

The originally filed specification discloses that the, “destination expert utility 77 can track and store the number of customer requests received, the number of customer requests answered, the average time to respond to customer requests, and additional information” (page 12, lines 18-21). The specification discloses throughout that customer requests comprise requests relating to any number of destinations and venues. Thus, practitioners would appreciate that in order to “track and store” such requests, the requests must be categorized into subsets. One example provided within the specification is that such requests may be tracked to monitor the function and the usage of the system and to determine the destinations where most requests are forwarded (*see*, page 12, lines 23-24). Therefore, Applicants assert that to provide such monitoring and tracking functions, the creation of subsets of customers is an inherent and necessary feature of the presently claimed invention. However, to expedite prosecution, Applicants amend the claims to more specifically recite a, “subset of customer *requests*” (emphasis added).

Regarding the presentation of relevant offer data to customers based on a subset of customer requests, Applicants assert that the originally filed specification provides adequate support in that customer requests can be monitored and tracked in order to, “tailor

advertisements placed on the GUI” (page 12, line 25). The Graphical User Interface (GUI) is defined as an interface, “through which the customer 10 can select a city to which the customer attends to travel” (page 10, lines 19-20). As such, Applicants assert that one of ordinary skill in the art would immediately appreciate that the system tracks and monitors customer requests in order to provide targeted offers to other customers accessing the system.

Rejection under 35 U.S.C. § 103(a)

The Examiner rejects claims 1-3, 5, 7-15, 17-22, 24-26, 28, 30, and 32 under 35 U.S.C. § 103(a) as being unpatentable over Taufique, WO 01/20518 A1 (“Taufique”), in view of Lauffer, U.S. Patent No. 6,223,165 B1 (“Lauffer”), in view of Gerace, U.S. Patent No. 5,991,735 (“Gerace”), and in further view of DeLorme et al., U.S. Patent No. 5,948,040 (“DeLorme”). Applicants respectfully traverse this rejection.

Applicants note that the Examiner has acknowledged claim 33 as pending in the Disposition of Claims, however, the Examiner has not recited the claim in the 35 U.S.C. § 103(a) rejection.

Taufique is limited to a unique configuration of a “help” utility as is frequently employed in current web sites. Many product web sites offer their customers several options for obtaining help, which may include, for example, a frequently asked questions web page, a knowledge base and a live help link. A frequently asked questions (FAQ) web page is usually compiled from a database of previously asked and answered questions, which usually requires an end user to review a list of questions to find one similar to their own. A knowledge base is very similar to a FAQ, although it usually requires the end-user to enter a specific question, which is used to automatically conduct a database search for similar questions, which have been previously answered.

Lauffer is limited to a system for delivering advice to consumers via a server unit that stores and displays the names and characteristics of experts, and then assists in connecting the expert and consumer for real-time communication. The server unit also has the ability to receive keywords from the consumer, match those keywords to one or more experts, and then tell the consumer how to contact an expert. The Lauffer system also includes a visual display of available experts that may be presented to consumers (col. 6, line 30 - col. 7, line 67). In addition, Lauffer teaches having the consumer compensate the expert, either directly or indirectly (col. 8, lines 1-53). In all embodiments disclosed by Lauffer, the consumer and expert establish

a connection, wherein the consumer and expert communicate interactively with each other (e.g., see col. 8, line 56 - col. 9, line 22).

DeLorme discloses a new Travel Reservations and Information System (TRIPS) that allows users to design a travel itinerary that is compiled based on a series of questions presented to the user. Specifically, the DeLorme system provides an interface, whereby a series of travel-related questions are presented to, and then answered by, the user. The questions include, for example, when, where, what to do, who to visit, and how to get there. The answers to the questions are then used by the DeLorme system to construct an itinerary, and then shop the itinerary to various providers of travel services such as hotels, airlines, and car rentals. After obtaining a number of quotes for the required travel services, they are presented to the user who may compare them side-by-side. DeLorme further discloses a TRIPS system that can make reservations based on a selected itinerary, print airline tickets, theatre tickets, rental vouchers, maps, and the like.

Gerace generally discloses a system for tracking user behaviors on the Internet in order to more accurately target marketing campaigns. Specifically, the Gerace system provides targeting of an advertising audience based on psychographic and/or behavioral profiles relating to Internet users. The Gerace system constructs a psychographic profile by recording computer activity and viewing habits of the user. Using a user specific profile, with or without additional user demographics, advertisements are displayed to appropriately selected users. Through a process of regression analysis of recorded responses of users viewing the advertisements, the target user profile is refined over a period of time to progressively provide more precise targeting.

In order for the Gerace system to provide this level of targeted advertising, the system must collect and store information that is specific to each individual user. Gerace stores information regarding an identified user's psychographic and/or behavioral profiles within a user profile. This user profile is then used by the system to individually target advertisements to specific users. Importantly, the Gerace system requires the user to initiate a relationship with the system and then provide personal information (*see*, column 4, lines 29-57). Thus, Internet users in the Gerace system must first register and provide the necessary personal information before the disclosed use monitoring and targeted advertising features are enabled. According to Gerace, "program controller 79 assigns a unique users computer ID upon user login. This, in turn, enables user profiling member 73 to initialize tracking of viewing activity of the new user

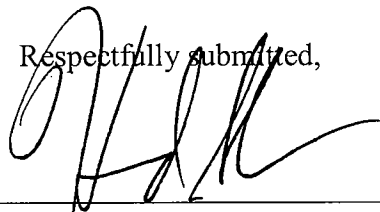
immediately following login" (column 5, lines 28-30). Therefore, **the targeted advertising of Gerace is directed toward the user based on their own Internet behaviors, as opposed to the collective usage information of other registered users.** In other words, the targeted advertising of Gerace is specifically dependent on an established relationship with an individual user. Accordingly, neither Taufique, Lauffer, DeLorme, Gerace, nor any combination thereof, disclose or suggest a destination expert server configured to at least compile, "offer data regarding the most frequently requested destination on information stored in the answer database relating to a subset of customer requests, wherein the offer data is used to select an offer relevant to the offer data for presentation to the customer," as similarly recited by amended independent claims 1, 8, 13 and 20.

Dependent claims 2, 3, 5, 7, 9-12, 14, 15, 17-19, 21, 22, 24-26, 28, 30, 32, and 33 variously depend from independent claims 1, 8, 13 and 20. As such, dependent claims 2, 3, 5, 7, 9-12, 14, 15, 17-19, 21, 22, 24-26, 28, 30, 32, and 33 are allowable for at least the reasons described above with respect to independent claims 1, 8, 13 and 20, as well as in view of their own respective features.

Applicants respectfully submit that the pending claims are in condition for allowance. No new matter is added in this Reply. Reconsideration of the application is thus requested. The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account No. 19-2814. Applicants invite the Examiner to telephone the undersigned, if the Examiner has any questions regarding this Reply or the present application in general.

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Respectfully submitted,



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